

REMARKS

By this Amendment, claims 1, 5, 18, 19 and 31 are amended, claim 4 is canceled, and claim 34 is added. Accordingly, claims 1, 3, and 5-34 are pending in this application.

In particular, claim 1 is amended to incorporate and clarify the subject matter originally recited in claim 4. See the specification at, for example, page 5, lines 15-23, and page 6, lines 21-25.

Reconsideration is respectfully requested.

Applicant's gratefully acknowledge the courtesies extended to Applicant's representative at the personal interview conducted March 8, 2005. The substance of the interview is incorporated into the following remarks, which constitute Applicants' record of the interview.

The Office Action rejects claims 1 and 3-33 under 35 U.S.C. §103(a) over U.S. Patent Application Publication No. 2002/0065709 to MacKenzie in view of U.S. Patent No. 6,606,615 to Jennings et al. (hereinafter "Jennings"). This rejection is moot with respect to canceled claim 4, and is respectfully traversed with respect to the remaining claims.

As discussed during the personal interview, Applicants submit that neither MacKenzie nor Jennings discloses or suggests "wherein feature assets relate to work styles of each subject," as recited in claim 1, and similarly recited in claims 18 and 19. The Office Action identifies the "knobby items" and the "coding information for each respondent" as corresponding to the feature assets. However, neither of these items relate to work styles of each subject. As described in paragraph [00054] of MacKenzie, knobby items are "processes under the control of management." As disclosed in paragraph [00069], coding information is information pertaining to each respondent such as "name, title, rank, unit, gender, years of experience, etc." These items are factual attributes of the respondent, and are not related to the work styles of each subject. One of ordinary skill in the art would not understand the

claim terms "work style" to include factual attributes such as name, title, rank, unit, gender and years of experience, because the word "style" means "a particular manner...by which something is done," not an attribute of the person. (Merriam-Webster Online Dictionary, <http://www.m-w.com/cgi-bin/dictionary?book=Dictionary&va=style>).

During the personal interview, the Examiner indicated that he had interpreted "work styles" to include factual information, because of the phrase in claim 5 which recited: "work styles of each subject include...location where work is performed." However, Applicants submit that the phrase in claim 5 was intended to convey a work style, such as "likes to work at home," or "likes to work while commuting to the office," etc. However, in order to avoid any confusion, the phrase "location where work is performed" is deleted from claim 5. Applicants respectfully submit that the term "work style" should be construed based on the dictionary definition given above.

Jennings discloses a contest that produces forecasting data for pre-designated variables whose values change over time. Nowhere in Jennings is it disclosed that the contest produces forecasting data related to the work styles of each subject. Accordingly, this feature is also not found in Jennings.

Thus, neither Jennings nor MacKenzie, either alone or in combination, discloses, teaches or suggests each and every feature recited in independent claims 1, 18 and 19. Claims 3 and 5-17 depend from claim 1, and are patentable for at least the reasons set forth above with respect to claim 1, as well as for the additional features they recite.

Regarding claims 20-33, Applicants submit that neither Jennings nor MacKenzie discloses, teaches or suggests "second awareness data knowledge items input by said plurality of subjects as becoming important for the organization in the future and determining as results for the second awareness data the number of inputs for each knowledge item input as

becoming important," as recited in independent claim 20, and similarly recited in each of independent claims 22-24 and 26-30.

The Office Action identifies the second awareness data as the "computed target" disclosed in MacKenzie, for example, in Table 4. However, MacKenzie defines the computed target in paragraph [00147] as being "computed from knowledge of the current results using the linear programming model." Therefore, the computed target is not "knowledge items input by said plurality of subjects as becoming important for the organization in the future," as the computed target is not input by the plurality of subjects, but is computed from the current results.

Although Jennings may arguably input data knowledge items by a plurality of subjects as becoming important for the organization in the future, nowhere in Jennings are "the number of inputs for each knowledge item input as becoming important" determined. Accordingly, neither MacKenzie nor Jennings, either alone or in combination, discloses, teaches or suggests each and every feature of independent claims 20, 22-24 and 26-30.

Regarding claim 31, Applicants submit that neither MacKenzie nor Jennings discloses, teaches or suggests "generating at least one community of subjects whose work styles are similar, based on the results of the analysis." The Office Action admits that MacKenzie does not disclose this feature, and relies on Jennings to supply the missing subject matter. However, while Jennings does disclose that participants may be given the opportunity to join clubs, nowhere does Jennings disclose that the clubs are based on the results of the analysis. During the interview, the Examiners asserted that the feature "based on the results of the analysis" was disclosed by the combination of MacKenzie and Jennings. However, Applicants submit that MacKenzie does not disclose an analysis which involves the work styles of the subjects, as argued above with respect to claim 1. Accordingly, the combination of MacKenzie and Jennings does not disclose this feature.

Accordingly, neither Jennings nor MacKenzie, either alone or in combination, discloses, teaches or suggests each and every feature recited in independent claims 1, 18-20, 22-24 or 26-31. Claims 3, 5-17, and 32-33 depend from claim 1, claim 21 depends from claim 20, and claim 25 depends from 24. Accordingly, claims 3 and 5-17, 21, 25 and 32-33 are patentable for at least the reasons set forth above with respect to claims 1, 20 and 24, as well as for the additional features they recite. Accordingly, Applicants respectfully request that the rejection of claims 1, 3 and 5-33 under 35 U.S.C. §103(a) be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 3 and 5-33 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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